

Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Western Regional Office • 436 Dwight Street, Springfield MA 01103 • 413-784-1100

DEVAL L. PATRICK Governor RICHARD K. SULLIVAN JR. Secretary

> DAVID W. CASH Commissioner

June 6, 2014

Mark Wasnewsky Interprint, Inc. 101 Central Berkshire Boulevard Pittsfield, MA 01201 **RE:** Pittsfield

Transmittal No.: X260625 Application No.: WE-14-002

Class: *OP*

FMF No.: 414411

AIR QUALITY PLAN APPROVAL

Administrative Amendment

Dear Mr. Wasnewsky:

The Massachusetts Department of Environmental Protection ("MassDEP"), Bureau of Waste Prevention, has reviewed your proposed administrative amendment to the Limited Plan Application ("Application") listed above. This Application concerns the proposed construction and operation of a new electron beam coating system at your existing facility located at 101 Central Berkshire Boulevard in Pittsfield, Massachusetts ("Facility").

This Application was submitted in accordance with 310 CMR 7.02 Plan Approval and Emission Limitations as contained in 310 CMR 7.00 "Air Pollution Control," regulations adopted by MassDEP pursuant to the authority granted by Massachusetts General Laws, Chapter 111, Section 142 A-J, Chapter 21C, Section 4 and 6, and Chapter 21E, Section 6. MassDEP's review of your Application has been limited to air pollution control regulation compliance and does not relieve you of the obligation to comply with any other regulatory requirements.

The Department of Environmental Protection, Western Regional Office ("MassDEP") received on May 29, 2014, a request to administratively amend the existing Limited Plan Approval #WE-14-002. The requested amendment is to change the electron beam coating system from being installed in-line with Rotogravure Lab Press (L-3) to being a stand-alone unit. The stand-alone electron beam coating system will have an increased maximum run speed of 200 meters of printed OPP film per minute instead of 160 meters of printed OPP film per minute.

The MassDEP has determined that this change can be incorporated into the existing Limited Plan Approval # WE-14-020 since there is no increase in facility emissions, that this change is in

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conformance with current air pollution control engineering practices and is in compliance with the administrative amendment regulations contained in 310 CMR 7.02(13).

MassDEP has determined that the Application is administratively and technically complete and that the Application is in conformance with the Air Pollution Control regulations and current air pollution control engineering practice, and hereby grants this **Plan Approval** for said Application, as submitted, subject to the conditions listed below.

Please review the entire Plan Approval, as it stipulates the conditions with which the Facility owner/operator ("Permittee") must comply in order for the Facility to be operated in compliance with this Plan Approval.

This Plan Approval will supersede Plan Approval WE-14-002, issued March 31, 2014, in its entirety.

1. **DESCRIPTION OF FACILITY AND APPLICATION**

Interprint, Inc. designs and prints decorative paper used as the design layer in laminate surfaces such as countertops, flooring, furniture, and store fixtures. Interprint, Inc has submitted an application to construct and operate a new electron beam (EB) coating system, consisting of an offset gravure coating station and an EB curing unit, at their existing facility, which currently operates in accordance with Operating Permit #1-O-08-006, issued November 2, 2012. Even though the facility is subject to the Operating Permit and Compliance Program pursuant to 310 CMR 7.00: Appendix C(2), it currently does not have the potential to emit major quantities of any applicable air contaminant and is not a major source of air contaminants.

The new EB coating system will be used primarily for new product development, but may also be used for a small amount of production coating. The end product will be an EB printed and coated oriented polypropylene (OPP) film. This product has been developed to compete with thermally fused melamine, commonly referred to as low pressure laminates.

The new EB coating system will consist of a Faustel MCL 3 Roll Offset Gravure Coater and an EB curing unit which will be comprised of an ESI EZcure I Model 125/60/750 with a Selfshield Model SF 125/750. The EB coating system will have a maximum coating width of 0.6 meters with a maximum run speed of 200 meters of printed OPP film per minute. The offset gravure coater will apply an EB coating to the OPP film that will have been printed by the existing Giave/5E-700 Rotogravure Lab Press, also known as Lab Press 3 (Emission Unit #2, Operating Permit #1-O-08-006). Then the OPP film will pass through the EB curing unit to activate and cure the coating to its dried and finished state. Nitrogen will be introduced to the curing zone to provide an inert atmosphere. The oxygen concentration in the process zone is less than 100 parts per million with an operating temperature from 60°F to 95°F so conditions will not favor the generation of nitrogen oxides.

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Air contaminant emissions from the process will be volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) which will be generated from the use of EB coatings, additives and cleanup materials.

Based on the facility's operation of an existing EB coating system, Emission Unit #5 in Operating Permit #1-O-08-006, the highest VOC content EB coating and additive will be a Nicoat E29603M and Nicoat 5243. The coating and additive will contain a maximum of 0.15 pounds of VOCs per gallon of coating (1.62% by weight VOCs) and 3.71 pounds of VOCs per gallon of additive (49.93% by weight VOCs) which are based on EPA Method 24 as specified on the associated material safety data sheet. EPA Method 24 was used for determining the VOC content of the materials since the maximum amount of VOCs contained in the material are not completely volatilized to atmosphere but are partially reacted by the EB curing unit. Using a mixture of 97% coating and 3% additive, the resultant VOC content of the as-applied coating will be a maximum of 3.07% by weight.

The highest HAP content EB coating and additive will be a Nicoat E29603M and Nicoat 5254. The coating and additive will contain a maximum of 0.02% by weight HAPs (formaldehyde) and 2.64% by weight HAPs (2.59% by weight naphthalene and 0.05% by weight benzene). Using a mixture of 97% coating and 3% additive, the resultant HAP content of the as-applied coating will be a maximum of 0.0986% by weight.

Based on the maximum coating as-applied VOC and HAP content and a maximum coating usage of 556,190 pounds in any 12 consecutive month period, the air contaminant emissions from the EB coating system will not exceed 8.54 tons of VOCs in any 12 consecutive month period and 548 pounds of HAPs in any 12 consecutive month period.

The cleanup material that will be used on the new EB coating system will be Yellow Magic. According to the material safety data sheet, Yellow Magic has a VOC content of 2.2% by weight and no HAPs. The facility plans to use no more than 330 gallons of this material in any 12 consecutive month period and will apply it to the equipment by hand using rags. Based on a maximum VOC content of 2.2% by weight and a maximum usage of 330 gallons of cleanup solvent in any 12 consecutive month period, the air contaminant emissions from the use of cleanup materials on the EB coating system will not exceed 0.03 tons in any 12 consecutive month period.

In addition to the EB coating system, a corona surface treatment device with a catalytic ozone eliminator will also be constructed in-line with Lab Press 3. The device will be a Corotec UNI-50 with a Corotec Nozone System. The purpose of the corona surface treatment device is to remove oils from and increase the surface tension of the substrate which enhances the adhesion of inks. The Corotec UNI-50 will emit ozone which will be controlled by the Corotec Nozone System.

The Corotec Nozone System is a catalytic ozone decomposer used to convert ozone in the air stream to oxygen. The unit is designed to reduce input ozone levels up to 300 parts per million mass basis to less than 0.1 parts per million mass basis at the outlet. Therefore, the Corotec

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UNI-50 with a Corotec Nozone System is exempt from the plan approval requirements of 310 CMR 7.02 since it is subject to and complies with the requirements of 310 CMR 7.03(21). However, the corona surface treatment device is still subject to the Operating Permit and Compliance Program requirements specified in 310 CMR 7.00 Appendix C.

Best Available Control Technology Analysis

The EB coating system must satisfy the best available control technology (BACT) requirements of 310 CMR 7.02(8)(a)2. However, the corona surface treatment device, consisting of a Corotec UNI-50 with a Corotec Nozone System, are exempt from the requirements of 310 CMR 7.02(4) and therefore not subject to 310 CMR 7.02(8)(a)2. in accordance with 310 CMR 7.03(21).

To satisfy the BACT requirements, the Permittee has proposed a combination of best management practices, pollution prevention and a limitation on raw material usage, in accordance with 310 CMR 7.02(8)(a)2.b., which is in lieu of an emission-unit-specific top-down BACT analysis. Based on the information contained in the application and supplemental submittals, BACT for the EB coating system will be the use of no more than 556,190 pounds of coatings in any 12 consecutive month period which will contain no more than 3.07 % by weight VOCs as-applied and no more than 0.0986% by weight HAPs as-applied, as well as the use of no more than 330 gallons of cleanup solvent in any 12 consecutive month period which will contain no more than 2.2% by weight VOCs. There will be no HAPs contained in the cleanup solvents. These restrictions will result in a maximum total emission rate of 8.57 tons of VOCs in any 12 consecutive month period and 548 pounds of HAPs in any 12 consecutive month period from the EB coating system.

The facility has proposed operational flexibility in using coatings for new product development that may contain more than the maximum allowable VOC content of 3.07% by weight asapplied. If a coating will contain more than 3.07% by weight VOCs as applied, then the coating may be used only if it can be demonstrated that the emissions will not exceed 15.6 pounds of VOC per hour. The hourly emission rate was calculated using a coating containing a maximum of 3.07% by weight as-applied with a lab press maximum coating width of 0.6 meters, a run speed of 160 meters per minute and a maximum coating weight of 40 grams per square meter. In addition, the VOC emissions from the combined use of coatings containing more than 3.07% by weight VOCs as-applied will be less than 1 ton in any 12 consecutive month period. These VOC emissions will be included as part of, and not in addition to, the EB coating system total VOC emission rate limitation of 8.57 tons in any 12 consecutive month period.

The EB coating system will also implement work practices concerning the storage, conveying and handling of coatings and cleanup solvents for the purposes of minimizing the evaporation of VOCs. MassDEP agrees with this BACT determination.

Regulatory Applicability

In addition to the EB coating system being subject to the BACT requirements of 310 CMR 7.02(8)(a)2, the facility is subject to the visible emission requirements of 310 CMR 7.06, the dust, odor, construction and demolition requirements of 310 CMR 7.09 and the noise reduction

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requirements of 310 CMR 7.10. There are no New Source Performance Standards (40 CFR Part 60) or National Emission Standards for Hazardous Air Pollutants (40 CFR Part 63) which apply to this source.

2. EMISSION UNIT (EU) IDENTIFICATION

Each Emission Unit (EU) identified in Table 1 is subject to and regulated by this Plan Approval:

	Table 1				
EU#	Description	Design Capacity	Pollution Control Device		
9	Electron Beam Coating System (including cleanup operations) consisting of the following equipment: • Faustel MCL 3 Roll Offset Gravure Coater • ESI EZcure I Model 125/60/750 with a Selfshield Model SF 125/750 - Electron Beam Curing Unit	Maximum 200 meters of printed OPP film per minute Maximum coating width of 0.6 meters	None		

Table 1 Key:

EU# = Emission Unit Number OPP = oriented polypropylene

3. APPLICABLE REQUIREMENTS

A. OPERATIONAL, PRODUCTION and EMISSION LIMITS

The Permittee is subject to, and shall not exceed the Operational, Production, and Emission Limits as contained in Table 2 below:

	Table 2				
EU#	Operational / Production Limit	Air Contaminant	Emission Limit		
9	1. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the coatings used by EU #9 shall not exceed a VOC content of 3.07% by weight as-applied, except as allowed in accordance with Table 2, condition #2 and# 3 herein.	VOC	≤ 2.15 tons per calendar month and ≤ 8.57 tons in any 12 consecutive month period		
	2. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, VOC emissions shall not exceed 15 .6 pounds per hour when applying a coating which has a VOC content greater than 3.07% by weight as-applied.				
3. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the combined VOC emissions from the use of coatings containing a VOC content greater than 3.07% by weight as-applied shall be less than 1 ton in any 12 consecutive month period.					
	4. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the cleanup solvents used by EU #9 shall not exceed a VOC content of 2.2% by weight and contain no HAPs.				
	5. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, no more than 330 gallons of cleanup solvents shall be used in any 12 consecutive month period.				
	6. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the coatings used by EU #9 shall not exceed a HAP content of 0.0986% by weight as-applied.	Total HAPs	≤ 137.0 pounds per calendar month and ≤ 548.0 pounds in any 12 consecutive month period		

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Table 2				
EU#	Operational / Production Limit	Air Contaminant	Emission Limit	
	7. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, no more than 556,190 pounds of coating shall be used on EU #9 in any 12 consecutive month period.			

Table 2 Key:

EU# = Emission Unit Number VOC = Volatile Organic Compounds HAPs = Hazardous Air Pollutants

B. <u>COMPLIANCE DEMONSTRATION</u>

The Permittee is subject to, and shall comply with, the monitoring, testing, record keeping, and reporting requirements as contained in Tables 3, 4, and 5 below:

Table 3					
EU#	EU# Monitoring and Testing Requirements				
9	The Permittee shall monitor all operations to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration.				
	If and when MassDEP requires it, the Permittee shall conduct emission testing in accordance with USEPA Reference Test Methods and regulation 310 CMR 7.13				

Table 3 Key:

EU# = Emission Unit Number

Table 4a				
EU#	Recordkeeping Requirements			
9	1. The Permittee shall maintain comprehensive and accurate records for EU #9 which shall include:			
	a. The identity of each coating and cleanup solvent used in EU #9;			
	b. The VOC and HAP content of each coating as-applied, used in EU #9;			
	c. The VOC and HAP content of each cleanup solvent, used in EU #9;			
	d. The amount (pounds) of each coating used in EU #9 during each month and in each 12 consecutive month period;			
	e. The amount (gallons) of each cleanup solvent used in EU #9 during each month and in each 12 consecutive month period;			
	f. The total pounds of VOCs emitted from EU #9; and			
	g. The total pounds of HAPs emitted from EU #9.			
	All emissions from Lab Press L- 3 (EU #2), even while operating in conjunction with the Electron Beam Coating System (EU #9), shall be tracked in accordance with the provisions of MassDEP Final Approval #1-P-11-008 issued September 29, 2011.			
	2. When using coatings which contain a VOC content greater than 3.07% by weight, the Permittee shall maintain comprehensive and accurate records of:			
	a. the pounds of VOC per hour emitted from EU #9; and			
	 the total VOC emissions from the use of coatings containing a VOC content greater than 3.07% by weight during each month and in each 12 consecutive month period. 			
	3. The Permittee shall maintain adequate records on-site to demonstrate compliance status with all operational, production, and emission limits contained in Table 2 above. Records shall also include the actual emissions of air contaminant(s) emitted for each calendar month and for each consecutive twelve month period (current month plus prior eleven months). These records shall be compiled no later than the 15 th day following each month. An electronic version of the MassDEP approved record keeping form, in Microsoft Excel format, can be downloaded at http://www.mass.gov/dep/air/approvals/aqforms.htm#report .			
	4. The Permittee shall maintain records of monitoring and testing as required by Table 3.			

	Table 4b				
EU#	Recordkeeping Requirements				
9	5.	The Permittee shall maintain a copy of this Plan Approval, underlying Application and the most up-to-date SOMP for the EU(s) approved herein on-site.			
	6.	The Permittee shall maintain a record of routine maintenance activities, affecting air contaminant emission rates, performed on the approved EU(s). The records shall include, at a minimum, the type or a description of the maintenance performed and the date and time the work was completed.			
	7.	The Permittee shall maintain a record of all malfunctions affecting air contaminant emission rates on the approved EU(s). At a minimum, the records shall include: date and time the malfunction occurred; description of the malfunction; corrective actions taken; the date and time corrective actions were initiated and completed; and the date and time emission rates and monitoring equipment returned to compliant operation.			
	8.	The Permittee shall maintain records to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration.			
	9.	The Permittee shall maintain records required by this Plan Approval on-site for a minimum of five (5) years.			
	10.	The Permittee shall make records required by this Plan Approval available to MassDEP and USEPA personnel upon request.			

Table 4 Key: EU# = Emission Unit Number

HAPs = Hazardous Air Pollutants
SOMP = Standard Operating and Maintenance Procedure
VOC = Volatile Organic Compounds
USEPA = United States Environmental Protection Agency

Table 5					
EU#	J# Reporting Requirements				
9		fy MassDEP, in writing, the date on which EU #9 commences operation at the ll be provided to MassDEP within (5) days of commencing operation.			
		mit to MassDEP all information required by this Plan Approval over the signature ial" as defined in 310 CMR 7.00 and shall include the Certification statement as .01(2)(c).			
	[413-755-2115], email [later than three (3) days shall be submitted to BV identification of exceed.	fy the Western Regional Office of MassDEP, BWP Permit Chief by telephone marc.simpson@state.ma.us] or fax [413-784-1149], as soon as possible, but no after discovery of an exceedance(s) of Table 2 requirements. A written report WP Permit Chief at MassDEP within ten (10) days thereafter and shall include: ance(s), duration of exceedance(s), reason for the exceedance(s), corrective in plan to prevent future exceedance(s).			
	required by the Source l	ort annually to MassDEP, in accordance with 310 CMR 7.12, all information as Registration/Emission Statement Form. The Permittee shall note therein any 10 CMR 7.02(2)(e), 7.03, 7.26, etc.), which did not require Plan Approval.			
		vide a copy to MassDEP of any record required to be maintained by this Plan s from MassDEP's request.			
		mit to MassDEP for approval a stack emission pretest protocol, at least 30 days g, for emission testing as defined in Table 3 Monitoring and Testing			
		mit to MassDEP a final stack emission test results report, within 45 days after ission testing as defined in Table 3 Monitoring and Testing Requirements.			

Table 5 Key: EU# = Emission Unit Number

4. SPECIAL TERMS AND CONDITIONS

The Permittee is subject to, and shall comply with, the following special terms and conditions:

A. The Permittee shall comply with the Special Terms and Conditions as contained in Table 6 below:

Table 6			
EU#	Special Terms and Conditions		
9	1. EU #9 shall consist of the equipment specified in Table 1 herein.		
	 Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the Permittee shall comply with the following work practices: a. Store all VOC and/or HAP-containing coatings, process-related waste materials and VOC and/or HAP-containing materials in closed containers; 		
	 ensure that mixing and storage containers used for VOC and/or HAP-containing coatings, process- related waste materials, and VOC and/or HAP-containing materials are kept closed at all times except when depositing or removing these materials; 		
	c. minimize spills of VOC and/or HAP-containing coatings, process-related waste materials, and VOC and/or HAP-containing materials;		
	 d. convey VOC and/or HAP-containing coatings, process-related waste materials, and VOC and/or HAP-containing materials from one location to another in closed containers or pipes; 		
	e. minimize VOC and/or HAP emissions from cleaning of application, storage, mixing, and conveying equipment by ensuring that:		
	i. equipment cleaning is performed without atomizing the cleanup solvent; and,		
	ii. all spent solvent is captured in closed containers; and		
	f. store and dispose of all absorbent materials, such as cloth or paper, that are contaminated with VOC and/or HAP-containing coatings, process-related waste materials, or VOC and/or HAP-containing materials in non-absorbent containers that shall be kept closed except when placing materials in or removing materials from the container.		
Facility- wide	3. The Permittee may make the approved changes herein, upon the submittal and receipt by MassDEP of a BWP AQ 10 Operating Permit Minor Modification application Pursuant to 310 CMR 7.00 Appendix C (8)(d)3.		
	4. Any prior Plan Approvals issued under 310 CMR 7.02 shall remain in effect unless specifically changed or superseded by this Plan Approval. The Facility shall not exceed the emission limits and shall comply with approved conditions specified in the prior Plan Approval(s) unless specifically altered by this Plan Approval.		

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Table 6 Key:

EU# = Emission Unit Number HAPs = Hazardous Air Pollutants VOC = Volatile Organic Compounds

B. The Permittee shall install and use an exhaust stack, as required in Table 7, on each of the Emission Units that is consistent with good air pollution control engineering practice and that discharges so as to not cause or contribute to a condition of air pollution. Each exhaust stack shall be configured to discharge the gases vertically and shall not be equipped with any part or device that restricts the vertical exhaust flow of the emitted gases, including but not limited to rain protection devices known as "shanty caps" and "egg beaters." The Permittee shall install and utilize exhaust stacks with the following parameters, as contained in Table 7 below, for the Emission Units that are regulated by this Plan Approval:

Table 7				
EU#	Stack Height Above Ground (feet)	Stack Inside Exit Dimensions (feet)	Stack Gas Exit Velocity Range (feet per second)	Stack Gas Exit Temperature Range (°F)
9	N/A	N/A	N/A	N/A

Table 7 Key:

EU# = Emission Unit Number °F = Degree Fahrenheit

5. **GENERAL CONDITIONS**

The Permittee is subject to, and shall comply with, the following general conditions:

- A. Pursuant to 310 CMR 7.01, 7.02, 7.09 and 7.10, should any nuisance condition(s), including but not limited to smoke, dust, odor or noise, occur as the result of the operation of the Facility, then the Permittee shall immediately take appropriate steps including shutdown, if necessary, to abate said nuisance condition(s).
- B. If asbestos remediation/removal will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that all removal/remediation of asbestos shall be done in accordance with 310 CMR 7.15 in its entirety and 310 CMR 4.00.

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- C. If construction or demolition of an industrial, commercial or institutional building will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that said construction or demolition shall be done in accordance with 310 CMR 7.09(2) and 310 CMR 4.00.
- D. Pursuant to 310 CMR 7.01(2)(b) and 7.02(7)(b), the Permittee shall allow MassDEP and / or USEPA personnel access to the Facility, buildings, and all pertinent records for the purpose of making inspections and surveys, collecting samples, obtaining data, and reviewing records.
- E. This Plan Approval does not negate the responsibility of the Permittee to comply with any other applicable Federal, State, or local regulations now or in the future.
- F. Should there be any differences between the Application and this Plan Approval, the Plan Approval shall govern.
- G. Pursuant to 310 CMR 7.02(3)(k), MassDEP may revoke this Plan Approval if the construction work is not commenced within two years from the date of issuance of this Plan Approval, or if the construction work is suspended for one year or more.
- H. This Plan Approval may be suspended, modified, or revoked by MassDEP if MassDEP determines that any condition or part of this Plan Approval is being violated.
- I. This Plan Approval may be modified or amended when in the opinion of MassDEP such is necessary or appropriate to clarify the Plan Approval conditions or after consideration of a written request by the Permittee to amend the Plan Approval conditions.
- J. Pursuant to 310 CMR 7.01(3) and 7.02(3)(f), the Permittee shall comply with all conditions contained in this Plan Approval. Should there be any differences between provisions contained in the General Conditions and provisions contained elsewhere in the Plan Approval, the latter shall govern.

6. MASSACHUSETTS ENVIRONMENTAL POLICY ACT

MassDEP has determined that the filing of an Environmental Notification Form (ENF) with the Secretary of Energy & Environmental Affairs, for air quality control purposes, was not required prior to this action by MassDEP. Notwithstanding this determination, the Massachusetts Environmental Policy Act (MEPA) and 301 CMR 11.00, Section 11.04, provide certain "Fail-Safe Provisions," which allow the Secretary to require the filing of an ENF and/or an Environmental Impact Report (EIR) at a later time.

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7. APPEAL PROCESS

This Plan Approval is an action of MassDEP. If you are aggrieved by this action, you may request an adjudicatory hearing. A request for a hearing must be made in writing and postmarked within twenty-one (21) days of the date of issuance of this Plan Approval.

Under 310 CMR 1.01(6)(b), the request must state clearly and concisely the facts, which are the grounds for the request, and the relief sought. Additionally, the request must state why the Plan Approval is not consistent with applicable laws and regulations.

The hearing request along with a valid check payable to the Commonwealth of Massachusetts in the amount of one hundred dollars (\$100.00) must be mailed to:

Commonwealth of Massachusetts
Department of Environmental Protection
P.O. Box 4062
Boston, MA 02211

This request will be dismissed if the filing fee is not paid, unless the appellant is exempt or granted a waiver as described below. The filing fee is not required if the appellant is a city or town (or municipal agency), county, or district of the Commonwealth of Massachusetts, or a municipal housing authority.

MassDEP may waive the adjudicatory hearing-filing fee for a person who shows that paying the fee will create an undue financial hardship. A person seeking a waiver must file, together with the hearing request as provided above, an affidavit setting forth the facts believed to support the claim of undue financial hardship.

Should you have any questions concerning this Plan Approval, please contact Cortney Danneker by telephone at 413-755-2234, or in writing at the letterhead address.

This final document copy is being provided to you electronically by the Department of Environmental Protection. A signed copy of this document is on file at the DEP office listed on the letterhead.

Marc Simpson
Air Quality Permit Chief
Bureau of Waste Prevention

ecc: MassDEP/Boston - Yi Tian

MassDEP/WERO – Peter Czapienski

Cristian Hine O'Brien & Gere 435 New Karner Road Albany, NY 12205